

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SALIMA HAWTHORNE, *et al*

Plaintiffs,

v.

**MUNICIPALITY OF NORRISTOWN
Defendant**

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CIVIL ACTION

No. 15-1572 GJP

**MOTION OF RESPONDENTS FOR MODIFICATION
OF THE COURT'S ORDER OF APRIL 29, 2016**

Gregg D. Zeff, Esquire, ("Zeff"), by and through his undersigned counsel, and with the agreement of Norristown's Insurer, the Travelers Companies, Inc. ("Travelers"), respectfully requests that the Court permit a modified schedule of payment of the award to Travelers in the originally ordered amount of \$33,517.99 and states in support thereof as follows:

1. On April 29, 2016, this Court granted the Motion filed by Defendant Municipality of Norristown ("Norristown") and ordered the payment of \$33,517.99 to be made to Norristown's insurer, The Travelers Companies, Inc. ("Travelers") within 60 days of the Order.

2. Recognizing his financial inability to make full payment of the award in the time originally allotted by the Court, Zeff, through counsel, requested Travelers to consider a schedule of payments of the full amount award by the Court over a reasonable period of time.

3. Following discussions between counsel, Travelers agreed to

scheduled payments as follows: (a) \$10,000.00 to be paid upon approval by the Court of the modified payment schedule; (b) \$2,000.00 to be paid on or before the first day of each month for eleven (11) months, beginning August 1, 2016 and continuing through June 1, 2017; and a final payment of \$1,517.99 to be made on or before July 1, 2017.

WHEREFORE, it is respectfully requested that the Court permit the requested modification in the payment schedule and enter an Order in accordance with the above agreed schedule in the form attached hereto.

Respectfully submitted,

Alan B. Epstein

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Attorney for Respondent Gregg D. Zeff

Dated: June 28, 2016